



November 20, 2013

Cindy Parker, Panel Co-Manager  
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**RE: PRFN COMMENTS ON IR 11 – CUMULATIVE EFFECTS ASSESSMENT**

Dear Ms. Parker,

In our letter to the Joint Review Panel dated July 31, 2013, we noted:

Meaningful mitigation strategies require the direct engagement of not only the proponent who is responsible for the impacts, but also with those who have the responsibility and jurisdiction to act. This idea was recognized in the *Guidelines for the Preparation of an Environmental Impact Statement*, which stated, “In cases where measures exist that are beyond the scope of the Proponent’s responsibility that could be effectively applied to mitigate these effects, the Proponent shall identify these effects and the parties that have the authority to act”(p.48).

We are currently working with SCI on an agreement in principle to address mitigation measures within their jurisdiction. This work is progressing well and we feel that best efforts are being made to meaningfully mitigate impacts. However, in order to deem the overall significance of impacts as “not significant”, we request the Crown, who has authority to act in a variety of jurisdictions where SCI does not, to address many outstanding issues, including the further erosion and alienation of our core land base, engagement in joint comprehensive land use planning, loss of our traplines, capacity for monitoring, harvester relocation and moose tag quotas. Without the Crown’s engagement on these cumulative impact issues, we feel that the residual cumulative effects are significant and have not been meaningfully mitigated.

We have recently initiated discussions with various Ontario ministries regarding our concerns of cumulative impacts and the need for mitigation strategies by the Crown. We are hopeful that these discussions will lead to new commitments that complement the work already being done

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by SCI. We will report our progress in the public hearings. Of note, Canada has not engaged us in any way in discussions regarding impacts and mitigation strategies.

With Regards,

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Chief Duncan Michano

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